

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

EDMAR FINANCIAL COMPANY, LLC; IRISH  
BLUE & GOLD, INC.; and XTX MARKETS  
LIMITED,

Plaintiffs,

v.

CURRENEX, INC.; GOLDMAN SACHS & CO.  
LLC; HC TECHNOLOGIES, LLC; STATE  
STREET BANK AND TRUST COMPANY;  
STATE STREET GLOBAL MARKETS  
INTERNATIONAL LIMITED; and JOHN DOE  
DEFENDANTS 1-5,

Defendants.

Case No. 1:21-cv-06598 (LAK)

**JOINT STIPULATION AND [PROPOSED] ORDER REGARDING THE SCHEDULE  
FOR FILING ANSWERS TO PLAINTIFFS' AMENDED COMPLAINT**

**WHEREAS**, on January 6, 2022, Plaintiffs Edmar Financial Company, LLC, Irish Blue & Gold, Inc., and XTX Markets Limited (together, “Plaintiffs”) filed an amended class action complaint (the “Amended Complaint”) against Defendants Currenex, Inc., State Street Global Markets International Limited, Goldman Sachs & Co. LLC, HC Technologies, LLC, State Street Bank and Trust Company, and John Doe Defendants 1-5 (collectively, “Defendants”) (Dkt. No. 41);

**WHEREAS**, on March 18, 2022, Defendants moved to dismiss the Amended Complaint (Dkt. Nos. 53, 56);

**WHEREAS**, on May 20, 2022, Plaintiffs filed their oppositions to Defendants’ motions to dismiss (Dkt. No. 64, 65);

**WHEREAS**, on July 18, 2022, Defendants filed their replies to Plaintiffs' oppositions (Dkt. Nos. 73, 74);

**WHEREAS**, on May 18, 2023, the Court issued an Opinion (the "Opinion"), granting in part and denying in part Defendants' motions to dismiss (Dkt. No. 83);

**WHEREAS**, pursuant to the Opinion, Defendant State Street Global Markets International Limited was dismissed from the action, while Defendants Currenex, Inc., Goldman Sachs & Co. LLC, HC Technologies, LLC, and State Street Bank and Trust Company remain in the action (the "Remaining Defendants");

**WHEREAS**, pursuant to the Opinion, Plaintiffs have the option to elect to amend the Amended Complaint by June 19, 2023; and

**WHEREAS**, there has been no prior request for an extension of Remaining Defendants' answer deadlines in this action since the Opinion.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and among the undersigned counsel for the signatory parties, subject to the Court's approval, that:

1. If Plaintiffs do not elect to amend the Amended Complaint, Remaining Defendants must file their answers to Plaintiffs' Amended Complaint by July 7, 2023.
2. If Plaintiffs elect to amend the Amended Complaint, the parties will meet and confer concerning the deadline for Remaining Defendants to respond to this further amended complaint, including discussing a briefing schedule for any potential motion(s) to dismiss.
3. Nothing in this stipulation prevents any party from seeking further extensions on the consent of the parties or from the Court.
4. Nothing in this stipulation is intended to curtail the rights under the Federal Rules that might otherwise exist absent this agreement.

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE LEWIS A. KAPLAN  
UNITED STATES DISTRICT JUDGE

Dated: May 31, 2023  
New York, New York

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I, Gregg L. Weiner, am the ECF user whose username and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER REGARDING THE SCHEDULE FOR FILING ANSWERS TO PLAINTIFFS' AMENDED COMPLAINT. I hereby represent that all signatories to this document have concurred in this filing.

Dated: May 31, 2023  
New York, New York

ROPES & GRAY LLP

/s/ Gregg L. Weiner

Gregg L. Weiner